

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

GENERAL MOTORS CORP., *et al.*,

Debtors.

Chapter 11

Case No. 09-50026-REG

(Jointly Administered)

**NOTICE OF APPEARANCE AND DEMAND FOR SERVICE OF PAPERS
AND REQUEST TO BE ADDED TO MASTER SERVICE LIST**

PLEASE TAKE NOTICE that the undersigned appears in the above-captioned cases on behalf of Law Debenture Trust Company of New York, as successor Indenture Trustee (*pending*) (“Law Debenture”), for certain unsecured notes issued by or on behalf of General Motors Corporation, a creditor and party-in-interest, and pursuant to Rules 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedure and section 1109(b) of the Bankruptcy Code, demand that all notices given or required to be given and all papers served in this case be delivered to and served upon the parties identified below at the following address and further request to be added to the Master Service List:

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PLEASE TAKE FURTHER NOTICE that pursuant to section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the above-mentioned Bankruptcy Rules, but also includes, without limitation, all orders, applications, motions, petitions, pleadings, requests, complaints or demands, whether formal or informal, written or oral, transmitted or conveyed by mail delivery, telephone, facsimile or otherwise, in this case.

This Notice of Appearance and any subsequent appearance, pleading, claim, or suit is not intended nor shall be deemed to waive Law Debenture's: (i) right to have final orders in non-core matters entered only after *de novo* review by a district court judge; (ii) right to trial by jury in any proceedings so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs or recoupments to which Law Debenture is or may be entitled under agreements, at law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are hereby reserved.

Dated: New York, New York
June 9, 2009

KELLEY DRYE & WARREN LLP

By: /s/ Jennifer A. Christian

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